

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

DUSHION DENNIS,

Plaintiff,

vs.

NO: 2:17-cv-13391

HON. GEORGE CARAM STEEH
MONA K. MAJZOUN

ALLSTATE PROPERTY AND CASUALTY
INSURANCE COMPANY

Defendant.

PLAINTIFF'S WITNESS, EXPERT, AND EXHIBIT LIST

NOW COMES Plaintiff, Dushion Dennis, by and through his attorneys, THE LOBB LAW FIRM, and for his Witness, Expert, and Exhibits List discloses the following witnesses, who may be relied upon for testimony at the time of trial in this matter

1. Dushion Dennis, Plaintiff
2. Latia Hendley, Household Replacement Services Provider
3. Damien Matthews, Household Replacement Services Provider
4. Drevaughn Tellis, Household Replacement Services Provider
5. Corina Malone, Household Replacement Services Provider
6. Any and all other parties involved in the motor vehicle accident.

7. Any and all employees, agents, representatives, and custodian or records for the Detroit Police Department, including but not limited to:
 - a. Officer Pauletta Greene (4530)
 - b. Any officer who responded to or investigated the accident at issue.
8. Any and all employees, agents, representatives, and custodian of records for Allstate Property and Casualty Insurance Company, including but not limited to:
 - a. Rosie Rexford
 - b. Any other No-Fault claims adjusters or any other employees that have attended the Plaintiff's claim for No-Fault benefits.
9. Potential Expert Witnesses:
 - a. Dr. Arvinder Dhillon (Medical Expert)
 - b. Dr. Monik Lala (Medical Expert)
10. Any and all employees, agents, representatives, administrative staff, records custodians, surgeons, physicians, physician's assistants, radiologists, nurses, and therapists who have attended to the Plaintiff's medical concerns at:
 - a. Professional Care Physical Therapy
 - b. Careway Transportation
 - c. Nova DME
 - d. Farmbrook Interventional Pain & EMG
 - e. DMC Sinai Grace Hospital
 - f. Auto RX
 - g. Northland Radiology
 - h. iCare Spine & Rehabilitation Center
 - i. Inscribed PLLC
 - j. Visitations LLC
 - k. Metro MRI Center/ Mobile MRI Staffing LLC
 - l. Orchard Toxicology
 - m. Comfort Care Center

n. Mobile Anesthesiologists of the Motor City

11. Any and all treating physicians.
12. Any and all IME doctors.
13. Any witnesses identified on the Defendant's Witness List.
14. All persons whose testimony is required to admit and/or authenticate evidence.
15. All persons deposed.
16. All persons identified in the discovery process, including interrogatories, depositions, pleadings, and documents.
17. All persons or entities named by other parties to this lawsuit whether or not called at the time of trial.
18. Any and all witnesses called for the purpose of rebuttal against any of Defendants' witnesses.
19. Plaintiff reserves the right to amend and/or supplement this Witness List as discovery is ongoing.

EXHIBITS LIST

1. Any and all medical records from any clinic and/or doctor's office and/or hospital that Plaintiff has visited as a patient.
2. Any and all attendant care, replacement service and medical mileage affidavits.
3. Any and all medical records from any facility or treating physician that has been identified on the Plaintiff's Witness and Experts List.
4. Police reports from the Michigan State Police Department.
5. Any documentation generated by the Michigan State Police Department in its investigation of the accident that the Plaintiff was involved in that is the subject of this lawsuit.

6. Any police reports.
7. Any and all photographs of the accident scenes and/or damage to the vehicles involved in the accident.
8. Any and all demonstrative evidence used by any expert or witness to this litigation.
9. Any report generated by any expert for the Plaintiff, and those experts on the Defendants' witness and expert lists.
10. Any report, publication, periodical, text, or authoritative documentation relied upon by any expert in this litigation.
11. Any statements prepared by any witness.
12. A copy of all policies of insurance from each and every Defendant in this litigation.
13. Any and all records and/or documentation relating to Plaintiff's application for social security and/or disability benefits.
14. Any and all exhibits listed on Defendant's Exhibit List.
15. Plaintiff reserves the right to amend this exhibits list prior to trial.

Dated: February 16, 2018

Respectfully Submitted;

The Lobb Law Firm

/s/ Levi T. Smith

LEVI T. SMITH (P80484)

Attorney for Plaintiff

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PROOF OF SERVICE

The undersigned certifies that on February 16, **2018** she served a copy of the foregoing document upon each of the attorneys of record, at the address listed on the caption, via:

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| <input type="checkbox"/> Mail | <input type="checkbox"/> Hand Delivery |
| <input type="checkbox"/> Facsimile | <input type="checkbox"/> Federal Express |
| <input type="checkbox"/> Email | <input checked="" type="checkbox"/> efile/eserve |

/s/ Gina Tavi

